

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

STAVANGER HOLDINGS, LTD and KARL
ANDERSEN,

Plaintiffs,

VS.

Civil Action No.: 12 - 00646 (WTL)(DKL)

TRANEN CAPITAL, LTD, TRANEN CAPITAL
ALTERNATIVE INVESTMENT FUND, LTD.,
THE LEO GROUP, LLC, KENNETH A.
LANDGAARD and ARTHUR L. BOWEN

Defendants.

PLAINTIFFS' PRELIMINARY WITNESS AND EXHIBIT LISTS

Plaintiffs Stavanger Holdings Ltd. and Karl Andersen, by and through their counsel, hereby submit their preliminary witness and exhibit lists. These lists have been prepared before Plaintiffs have completed discovery or their investigation of the issues involved in this litigation. Therefore, Plaintiffs reserve the right to amend and supplement these preliminary witness and exhibit lists pursuant to the Case Management Plan.

PRELIMINARY WITNESS LIST

- (1) Karl Andersen
250 West 50th St Apt 25A
New York, NY 10019
- (2) Tranen Capital Ltd. and Tranen Capital Alternative Investment Fund Ltd.
30 De Castro St.
Road Town, Tortola
British, Virgin Islands, VG 1110

- (3) Arthur Bowen
155 Federal St.
Boston, MA 02110
- (4) Kenneth A. Landgaard
3750 Wahtomin Trail NW
Alexandria, MN 56308
- (5) The Leo Group
14297 Bergen Blvd, STE 250
Noblesville, IN 46060
- (6) Randy Bagley
3109 W 300
S. Tipton, IN 46072
1206 Brown Bear Ct
Wentzville, MO 63385
- (7) Brock Bagley
14297 Bergen Blvd, STE 250
Noblesville, IN 46060
- (8) John W. Boyd, Esq.
Barnes & Thornburg, LLP
11 South Meridian Street
Indianapolis, Indiana 46204-3535
- (9) Every person identified by Defendants in their preliminary witness list or in any amendment or supplement thereto.
- (10) Persons who may be identified through discovery.
- (11) Any person deposed in this action.
- (12) All witnesses called at any hearing in this action by any party.
- (13) Expert witness(es) to be determined and identified in accordance with the provisions of the Case Management Plan.

This list does not include witnesses Plaintiffs may call solely for the purpose of laying the foundation for exhibits. Plaintiffs specifically reserve the right to amend or supplement their list of witnesses in accordance with the Case Management Plan as may become necessary during the course of the litigation of this action. If Plaintiffs identify additional witnesses they intend to call, their counsel will promptly furnish the names of such witnesses to the Court and counsel.

PRELIMINARY EXHIBIT LIST

1. All versions of the Leo/Andersen Agreement referenced in the Amended Complaint, including all drafts and executed versions.
2. All versions of the Leo/Tranen Agreement referenced in the Amended Complaint, including all drafts and executed versions.
3. All documents and other materials related to the Leo/Andersen Agreement.
4. All documents and other materials related to the Leo/Tranen Agreement.
5. All documents and other materials reflecting the value of services rendered by Plaintiffs to Defendants.
6. All documents attached to the Amended Complaint.
7. All documents and other materials concerning payments to Plaintiff by Defendants.
8. All emails, letters, and other communications regarding the Leo/Andersen and Leo/Tranen Agreements.
9. All emails, letters, and other communications concerning the services rendered by Plaintiffs.

10. All documents produced by the parties or any non-party in response to discovery requests.

11. All documents identified in any initial disclosures in this action.

12. All documents identified in any exhibit list filed in this action.

13. All deposition transcripts and exhibits to depositions.

14. All documents necessary for impeachment or rebuttal purposes.

If Plaintiffs discover additional exhibits that they intend to use at the trial of this action, counsel for Plaintiffs will furnish an identification of the additional exhibits to the Court and counsel pursuant to the Case Management Plan. Plaintiffs reserve the right to amend this list as discovery continues.

Dated: April 1, 2013
New York, New York

Duane Morris LLP

By: /s/Mauro M. Wolfe
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Evangelos Michailidis
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New York, NY 10023
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Faegre Baker Daniels LLP

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Attorneys for Plaintiffs

CERTIFICATION

I hereby certify that on this **1st** day of **April, 2013**, a copy of the above was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail on anyone unable to accept electronic filing.

/s/ Ryan Hurley
Ryan Hurley, Esq.